

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:
Riki McGettigan	:
	:
Debtor	Case No.: 18-17451AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by and through her undersigned counsel, hereby moves to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor's Plan was confirmed by this Honorable July 24, 2019.
2. Debtor recently made undersigned Counsel aware that she entitled to an inheritance.
3. After discussing the issue with the Chapter 13 Trustee, and in order for the Debtor to receive her exempted portion of the inheritance, Debtor is motioning to modify her confirmed Plan to a 100% payback to her creditors. **See proposed Modified Plan attached here and marked as "Exhibit A."**
4. This correction remains fair to all creditors given the facts of this case, and allows the Debtor to receive her Discharge in Bankruptcy.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: March 9, 2020

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor